

United States District Court
NORTHERN DISTRICT OF GEORGIA

Date: Feb 04 2021

JAMES N. HATTEN, Clerk

By: B. Parrish
Deputy Clerk

UNITED STATES OF AMERICA

v.

CRIMINAL COMPLAINT

Moradeyo Bandele

Case Number: 1:21-mj-0121

I, the undersigned complainant, depose and say under penalty of perjury the following is true and correct to the best of my knowledge and belief. Beginning or about February 14, 2020 and continuing until on or about February 24, 2020, in Rockdale County, in the Northern District of Georgia, and elsewhere, the defendant did, knowingly recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize and solicit "N.S.," a minor, to cause or intend to cause the victim to engage in a commercial sex act, for the purpose of benefitting financially or by receiving anything of value, in violation of Title 18, United States Code, Section(s) 1591(a) and (b)(2).

I further state that I am a(n) FBI Special Agent and that this complaint is based on the following facts:
PLEASE SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof. Yes

T. Dervish

Signature of Complainant
Taylor M. Dervish

Based upon this complaint, this Court finds that there is probable cause to believe that an offense has been committed and that the defendant has committed it. Sworn to me by telephone pursuant to Federal Rule of Criminal Procedure 4.1.

February 4, 2021

Date

at Atlanta, Georgia

City and State

REGINA D CANNON

UNITED STATES MAGISTRATE JUDGE

Name and Title of Judicial Officer

AUSA Lauren T. Macon / 2020R00801 /

lauren.macon@usdoj.gov

R. Cannon

Signature of Judicial Officer

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, FBI Special Agent Taylor Michelle Dervish, depose and state under penalty of perjury the following:

INTRODUCTION

1. I make this affidavit in support of a Criminal Complaint against MORADEYO BANDELE, a 25-year-old male, for the sex trafficking of a juvenile in violation of Title 18, United States Code § 1591.
2. As discussed below, based upon this investigation, there is probable cause to believe that BANDELE knowingly recruited, enticed, harbored, transported, provided, obtained, advertised, maintained, patronized or solicited “N.S”, a minor, to engage in a commercial sex act, for the purpose of benefiting financially or by receiving anything of value in violation of Title 18, United States Code, Section 1591.
3. I am a Special Agent with the Federal Bureau of Investigation (FBI), and have been so employed since June 2014. I am currently assigned to the Atlanta field office, where I investigate Violent Crimes Against Children (VCAC). I have participated in multiple criminal investigations related to child exploitation and adult human trafficking including violations pertaining to the sex trafficking of children or by force, fraud or coercion, in violation of Title 18, United States Code, Section 1591. I have received training in the area of child exploitation. As a federal agent, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States.
4. The statements in this affidavit are based primarily upon my knowledge of the matter as well as information provided by other law enforcement officers. Since this affidavit is being submitted for the limited purpose of securing a complaint and arrest warrant, I have not

included every fact known to me concerning this investigation; rather, I have set forth only the facts necessary to establish probable cause.

FACTS ESTABLISHING PROBABLE CAUSE TO ARREST

5. On February 24, 2020, The National Human Trafficking Hotline (NHTH) provided information to your affiant regarding the potential sexual exploitation of two 16-year-old girls, later identified as R.H. and R.R., at the Conyers Inn located at 1056 Dogwood Drive, Conyers, Georgia in the Northern District of Georgia. An investigation into suspected sex trafficking of minors and other crimes ensued. During the investigation, N.S. and S.G., both minors, were also identified as possible victims of sexual exploitation.
6. R.H., R.R., S.G. and N.S. were each interviewed by your affiant, the Conyers Police Department, and/or adolescent/forensic interviewers between February 24, 2020 and May 5, 2020.
7. BANDELE was identified by the Conyers (Georgia) Police Department on February 24, 2020. Conyers Police Department received a disturbance complaint and came into contact with R.H. R.H. stated that she was raped by BANDELE, who she identified by name and also provided a telephone number for. Conyers Police Department obtained warrants for BANDELE for rape and felony interference of custody. Conyers Police Department also got a ping order for BANDELE'S cell phone. BANDELE was located and arrested in Florida on February 25, 2020. During the interviews with N.S., R.R. and S.G., each identified BANDELE by the name of "Mo" and provided a physical description.

N.S.

8. N.S. is a minor born on XX/XX/2003. N.S. was interviewed by your affiant on February 27, 2020. N.S. was interviewed for a second time on April 22, 2020 by a child adolescent

forensic interviewer. During these interviews, N.S. provided the following information.

9. N.S. met BANDELE through a dating website or app called "Meet Me." From my training and experience, I know Meet Me to be a dating website and cell phone app that is commonly used for prostitution. N.S. said BANDELE was supposed to be a "play," but instead N.S. and BANDELE started dating. In my training and experience, I know "play" to mean a date for sex in exchange for money. N.S. met BANDELE approximately a month before she was first interviewed and had been spending time with him off and on since meeting.
10. N.S. said BANDELE began setting up plays for N.S. through dating sites.

**Investigation into trafficking of R.H., R.R., N.S. and S.G. between
February 21 and February 25, 2020**

11. According to interviews of N.S., R.H., R.R., and S.G., BANDELE drove N.S. and R.H. from Georgia to South Carolina to pick up R.R. and S.G. on or about February 21, 2020. After picking up R.R. and S.G., BANDELE drove all four girls back to Georgia and checked them into a hotel room at the Conyers Inn located at 1056 Dogwood Drive, Conyers, Georgia. BANDELE gathered the four girls together because he intended for them to engage in commercial sex acts in exchange for money. R.H., R.R., and S.G. indicated that BANDELE knew their respective ages before they arrived at the Conyers Inn.
12. According to R.H., BANDELE set up dates for R.H. on Plenty of Fish, Meet Me, Badoo and Tinder. In my training and experience, I know these sites to be dating websites and cell phone apps that are commonly used for prostitution. R.H. said BANDELE set up dating profiles for R.H. using pictures of R.H. and communicated with potential dates on her behalf. N.S. indicated that BANDELE asked her to set up accounts for the girls on dating websites. N.S. said BANDELE wanted her to pimp the other girls out, but N.S. thought they could make more money if she worked as a prostitute as well. N.S. said she took calls from

potential dates for the other girls.

Forensic Examination of BANDELE's Cell Phone

13. A search warrant, issued in the 15th Judicial Circuit in and for Palm Beach County, Florida on February 26, 2020, was executed on a black Apple iPhone, telephone number 770-744-7479, belonging to BANDELE and seized in connection with BANDELE'S arrest. The cell phone was located on BANDELE'S person.
14. Your affiant reviewed the forensic image of the cell phone and located the following.
15. A child sexual abuse material (CSAM) image of N.S. was sent to BANDELE on February 15, 2020. In the image, N.S. was bending over in front of a couch. N.S.'s pants were pulled down around her ankles. The focus of the image is N.S.'s rear end.
16. The phone contained SMS messages between N.S. and BANDELE regarding prostitution between February 14, 2020 and February 25, 2020. Specifically,
 - On February 16, 2020, BANDELE asked N.S if she was good and then said "He ready".
 - N.S stated, "Almost not yet"
 - BANDELE said, "Bet I need a 'he's ready'"
 - N.S. responded, "Daddy hold up"¹
 - On February 17, 2020, BANDELE asked N.S., "You got the room".
 - N.S. stated, "They have me doing it at someone's house they getting me the room Friday", then said, "I'm getting the room tonight and they bought me a dress and some shoes and a purse"

¹ In my training and experience, I know victims of sex trafficking often refer to their traffickers as "Daddy".

- BANDELE responded, “So you safe right now, you good?”
 - N.S. stated, “Yeah I miss u”
 - BANDELE responded, “Don't miss me too much, we gotta get this schmoney first”
 - N.S. said, “U right daddy”
 - BANDELE responded, “Imma tech you how to play these [niggas] too”
- Later on February 17, 2020, BANDELE asked, “You good, you got the room yet?”
 - N.S. said, “No but i'm bout to get it soon”
 - BANDELE responded, “Are you at least making money”
 - BANDELE asked, “How much you made?”
 - N.S. responded, “So far 55”
 - BANDELE asked, “How many play you did?”
 - N.S. said, “I'm charging 75 a hour”
 - BANDELE responded, “Bet”
- Later the same date, BANDELE stated, “Naa see I can't do this with you, you too Green for me either that or they really got you brainwashed and I can't work with you if you still feel attached to them”. BANDELE also said, “I told yo ass keep it a buck with me and you really costing me money instead of making it. I got enough expenses as it is”.
- On February 18, 2020, N.S. stated “I need u to tell any plays if they want to fuck wit me put up 75 for a room and 75 a hour to chill wit me”. N.S. then said, “Ima be switching rooms to niggas need to be buying them s I can work them out and then move on”.

- BANDELE responded, “It's either you get a room off old Nat or Candler or I'm not fucking with you”²
- N.S. stated, “I'll get a room off old national but I need more plays do I can get more money”
- BANDELE responded, “Then you better start lining them up”
- BANDELE then said, “A room off old nat or candler is 65. I'll cover the difference but not until you have 2 guaranteed plays”
- N.S. said, “Imma calm you when I get off the exit, be ready at the front of the complex”
- BANDELE responded, “Have your money wit you”
- N.S. said, “I have a play who will pay for the room”
- On February 23, 2020, N.S. asked BANDELE, “Y'all making money”.
- On February 25, 2020, N.S. texted BANDELE and stated, “It's me Tajah³ I got a new number”.
 - BANDELE responded, “Idk wha up with them two chicks but US Marshall shit down my neighborhod and was looking for me HARD”
 - BANDELE then stated, “I say leave that chick alone bruh”
 - N.S. responded, “What chicks even the first one I'm wit” and “In still with the other girl”

² Your affiant knows that “Old Nat” and “Candler” are roads located in Fulton and Dekalb County, Georgia, in the Northern District of Georgia. In my training and experience, I know that there are numerous hotels on Old National and Candler Road where prostitution is prevalent.

³ I understand “Tajah” to be a nickname used by N.S.

- BANDELE said, “I ain't gon say I love you because I wold be lying but I do got love for you babygirl just be safe and smart if you decide to roll with shorty still”
- BANDELE also exchanged messages with “Jakayla” and on February 17, 2020, stated “Where yo baby daddy at...Because I'm tryna run up a check...Naa I'm asking because I'm tryna see if you can drop your son with the baby daddy and have him watch him for a few months and we can hit the road and frfr run a check up”.
 - BANDELE went on to say, “I got two chick who already down to run it up would be nice to have one more frfr like a our own little family”
 - Jakayla responded, “So we finna be scamming nighas”
 - BANDELE responded, “And sucking a lil dick and giving a little pussy too, these mufukkas paying BIGGG money”
 - Jakayla stated, “Oh okay so we prostitutes an u the pimp”
 - BANDELE responded, “Hell ye”
- On February 19, 2020, BANDELE asked, “You know anyone else who is down?”
 - Jakayla said, “Ik plenty of bitxhes who sell pussy”
 - BANDELE responded, “What's up, let me holla at them because I can set up some shit up to get a few vehicles and we can really run a check up”
- On February 23, 2020 at 3:28:18 (UTC-5), BANDELE sent a message to "Ashelon" that stated he was in South Carolina. BANDELE also sent a text to 917-935-0522 at 10:51:41 (UTC-5) on the same date that said “in South Carolina”.

CONCLUSION

17. Based on the foregoing information, I respectfully submit that there is probable cause to

believe that on or about February 14, 2020 through February 23, 2020, in the Northern District of Georgia and elsewhere, MORADEYO BANDELE did knowingly recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize or solicit “N.S”, a minor, to cause or intend to cause the victim to engage in a commercial sex act, for the purpose of benefiting financially or by receiving anything of value in violation of Title 18, United States Code, Section 1591.